

**COHN LIFLAND PEARLMAN HERRMANN & KNOPF LLP**

COUNSELLORS AT LAW

PARK 80 WEST - PLAZA ONE • 250 PEHLE AVENUE, SUITE 401 • SADDLE BROOK, N.J. 07663  
201-845-9600 • FAX 201-845-9423

Peter S. Pearlman, Esq.  
[psp@njlawfirm.com](mailto:psp@njlawfirm.com)  
Direct Dial: 551-497-7131  
Cell: 201-709-0597

General E-mail: [ciphk@njlawfirm.com](mailto:ciphk@njlawfirm.com)  
Internet Address: [www.njlawfirm.com](http://www.njlawfirm.com)

January 19, 2012

**VIA ECF**

Hon. William J. Martini, USDJ  
M.L. King Jr. Federal Building & Courthouse  
50 Walnut Street, Room 4076  
Newark, NJ 07102

Re: Ricky Dudley v. Christian W.E. Haub, et al.  
Case No.: 11-5196 (WJM-MF)  
Our File No.: 38,382-0

Dear Judge Martini:

On behalf of lead plaintiffs City of New Haven Employees' Retirement System and Plumbers and Pipefitters Locals 502 & 633 Pension Trust Fund I enclose a proposed Stipulation and Order scheduling the filing of an amended complaint, defendants' responses thereto, and, should defendants move with respect to that complaint, a briefing schedule for the motion(s) to dismiss. As Your Honor can see, this Stipulation has been signed on behalf of all parties, and we ask that Your Honor enter it if you find it satisfactory.

Naturally, should Your Honor have any questions please feel free to contact any counsel at your convenience.

Respectfully yours,

Peter S. Pearlman

PSP:glv  
Enclosure  
cc: All Counsel of Record (via ECF and email w/enc.)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

RICKY DUDLEY, Individually and On Behalf ) No. 2:11-cv-05196  
of All Others Similarly Situated, )  
Plaintiff, ) STIPULATION AND [PROPOSED] ORDER  
vs. )  
CHRISTIAN W.E. HAUB, ERIC CLAUS, )  
BRENDA M. GALGANO, ANDREAS )  
GULDIN, RON MARSHALL and SAMUEL )  
MARTIN, )  
Defendants. )

---

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by and among the undersigned counsel to the parties in the above-captioned action, as follows:

1. Lead Plaintiffs City of New Haven Employees' Retirement System and Plumbers and Pipefitters Locals 502 & 633 Pension Trust Fund ("Lead Plaintiffs") shall file their Amended Complaint on March 2, 2012.
2. Defendants shall, no later than May 1, 2012, answer, move or otherwise respond to the Amended Complaint.
3. Lead Plaintiffs shall, no later than July 2, 2012, file and serve their response to Defendants' motion to dismiss.
4. Defendants shall, no later than August 16, 2012, file and serve any reply in support of their motion to dismiss.

By: /s/ Michael S. Gordon

Michael S. Gordon  
Alan R. Friedman  
KATTEN MUCHIN ROSENMAN LLP  
575 Madison Avenue  
New York, NY 10022-2585  
Telephone: 212/940-8800  
212/940-8776 (fax)

David H. Kistenbroker  
Joni S. Jacobsen  
Ashley J. Burden  
KATTEN MUCHIN ROSENMAN LLP  
525 West Monroe Street  
Chicago, IL 60661-3693  
Telephone: 312/902-5200  
312/902-1061 (fax)

*Attorneys for Defendants Eric Claus  
and Ron Marshall*

By: /s/ Peter S. Pearlman

Peter S. Pearlman  
COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP  
Park 80 West-Plaza One  
250 Pehle Avenue, Suite 401  
Saddle Brook, NJ 07663  
Telephone: 201/845-9600  
201/845-9423 (fax)

Samuel H. Rudman  
ROBBINS GELLER RUDMAN  
& DOWD LLP  
58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

*Attorneys for Lead Plaintiffs and the  
Class*

By: /s/ Lawrence M. Rolnick

Gary Bornstein  
CRAVATH, SWAINE & MOORE LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019  
Telephone: 212/474-1084  
212/474-3700 (fax)

Lawrence M. Rolnick  
LOWENSTEIN SANDLER LLP  
65 Livingston Avenue  
Roseland, NJ 07068  
Telephone: 973/597-2468  
973/597-2469 (fax)

*Attorneys for Defendants Christian W.E.  
Haub and Andreas Guldin*

By: /s/ Allen W. Burton

Bradley J. Butwin  
Allen W. Burton  
O'MELVENY & MEYERS LLP  
Times Square Tower  
7 Times Square  
New York, NY 10036  
Telephone: 212/326-2282  
212/326-2061 (fax)

*Attorneys for Defendants Brenda M.  
Galgano and Samuel Martin*

\* \* \*

PURSUANT TO THIS STIPULATION, IT IS HEREBY SO ORDERED.

Dated: January \_\_\_, 2012

---

HONORABLE WILLIAM J. MARTINI  
UNITED STATES DISTRICT JUDGE